

FREEDOM FUNDING GROUP, INC VS. THE FREEDOM FUNDINGGROUP L.L.C , et al

3:20-CV-18404-ZNQ-DEA

Dear Honorable Quraishi Honorable Alpert,

I Gerald A. Firestone, pro se write this letter on behalf of The Freedom Funding Group L.L.C in reference to three open motions in this case. The Plaintiffs lawyer Walter Luers has filed a motion on 10/20 which we are asking the court to not to decide until the previous two motions, one for dismissal by the defendants and one by the plaintiff for summary judgement have been ruled on. We believe that the motion filed on 10/20 by plaintiff has already been discussed on the last conference. On the last conference it was decided that discovery was not needed and the judge agreed to let the defendants file a motion to dismiss as they recently fired the previous attorneys as they believed that these attorneys were churning the case and not acting in the defendants best interest. The judge agreed and we proceeded to file the motion to dismiss and plaintiff filed motion for summary judgement. It was agreed that no need for discovery because case should be decided one way or other on these two motions as the defendants cannot represent a corporation personally in NJ . Plaintiffs attorney has filed two motions one on 10/19 which was not granted and one on 10/20 which looks like it is to be heard on 11/15. We would ask the court to decide on the motion to dismiss or motion for summary judgement before considering the 10/20 motion of the plaintiff as they are related matters that have already been discussed by the court thank you.

Gerald A. Firestone

Pro se The Freedom Funding Group L.L.C